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November 6, 2020

VIA ECF

Hon. Loretta A. Preska
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007-1312

Re: *United States v. Donziger*, No. 19 Cr. 561 (LAP); 11 Civ. 691 (LAK)

Dear Judge Preska:

We write on behalf of the United States to inform the Court that the Government consents to the defense request for an adjournment of the trial date. While we are ready for trial on Monday, November 9, 2020 (just as we were ready to begin trial on September 9), and Mr. Donziger has certainly had adequate opportunity to secure counsel in-person for the November 9 trial, we do not oppose allowing Mr. Donziger additional time to secure counsel to attend trial in-person.

During a conference call today with defense counsel Lauren Regan and her “of counsel” Ronald Kuby, Mr. Kuby committed to filing a notice of appearance in this matter and appearing in-person for a January 19, 2021 trial date. Ms. Regan also agreed to a January 19, 2021 trial date. Ms. Regan noted that she has a federal criminal trial presently scheduled to commence in Iowa on December 7, 2020 and Mr. Kuby informed us he was unavailable for a December trial. Accordingly, the Government consents to the defense request for an adjournment, and respectfully requests that a firm trial date be set for January 19, 2021 assuming that date is acceptable for the Court.

Respectfully submitted,

/s/
Rita M. Glavin
Brian P. Maloney
Sareen K. Armani
*Special Prosecutors on behalf
of the United States*